



U.S. Department of Justice

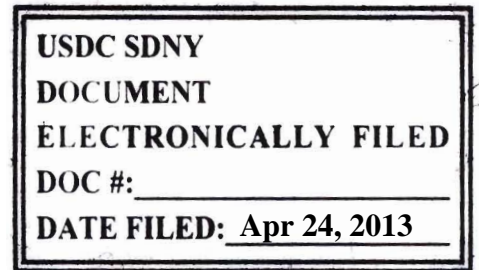
*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 24, 2013

BY E-MAIL

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square, Room 2202
New York, New York 10007



Re: United States v. Alimzhan Tokhtakhounov et al.,
13 Cr. 268 (JMF)

Dear Judge Furman:

The Government writes regarding the bail conditions for defendant Hillel Nahmad, a/k/a "Helly." At the defendant's April 16, 2013 presentment in the Central District of California, the Court set the following bail conditions:

- a \$500,000 appearance bond, to be secured by his apartment at Trump Tower, 721 Fifth Avenue, Apartment 51H-F, New York, New York, by April 29, 2013;
- travel restricted to the Central District of California and the Southern District of New York;
- the defendant to surrender all travel documents and make no new applications; and
- the defendant to have no contact with victims, witnesses, or co-defendants.

As directed by the Court at the April 19, 2013 arraignment and initial conference, the Government has conferred with the defendant's counsel regarding an appropriate bail package for this District. The parties jointly propose the following bail conditions for the Court's consideration:

- a \$10,000,000 personal recognizance bond, secured in full by his apartment at Trump Tower, 721 Fifth Avenue, Apartment 51H-F, New York, New York, and co-signed by one financially responsible person (his sister, Marielle Safra), with the security and co-signer conditions to be met by May 1, 2013;
- travel restricted to the Southern and Eastern Districts of New York;

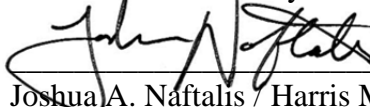
- the defendant to surrender all travel documents and make no new applications;
- regular Pre-Trial supervision;
- drug testing and treatment as appropriate; and
- the defendant to have no contact with victims, witnesses, or co-defendants (except in the presence of counsel).

The Government is of course available for a conference regarding this matter.

Respectfully submitted,


PREET BHARARA
United States Attorney

By:


Joshua A. Naftalis / Harris M. Fischman
Assistant United States Attorneys
(212) 637-2310 / 2305

cc: Benjamin Brafman, Esq.
Paul Shechtman, Esq.

SO ORDERED:


JESSE M. FURMAN
United States District Judge

April 24, 2013